

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

*Plaintiff,*

*vs.*

Case No. 23-cr-8

KEVIN MCCAA,

*Defendant.*

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**MOTION FOR EARLY DISCLOSURE OF  
OTHER ACTS EVIDENCE, EXPERT NOTICE, AND OTHER EVIDENCE**

Kevin McCaa, by counsel, moves this Court for an order requiring the government to provide at least 60 days' notice of its intent to introduce at trial: (1) other acts evidence under Rule 404(b); (2) notice of expert testimony as required by Fed. R. Crim. P. 16; (3) identification of the specific jail calls or other statements of Mr. McCaa the government intends to present at trial; and (4) identification of any specific evidence obtained from any cell phone or cell phone record, social media, or cell site location record that the government intends to present at trial. McCaa also seeks an order requiring the government to disclose any *Giglio* material at least 45 days before trial. McCaa requests early disclosure of this evidence to allow him a reasonable opportunity to respond to the government's evidence, to resolve issues concerning the admissibility of evidence pretrial, and to adequately prepare for trial.

Dated at Milwaukee, Wisconsin this 20th day of October, 2023.

Respectfully submitted,

/s/ Joshua D. Uller

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